

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

-vs-

Rafael Figueroa and Wilma Garcia

CRIMINAL COMPLAINT

CASE NUMBER: 3:06-mj-36

I, Michael T. Baumgardner, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

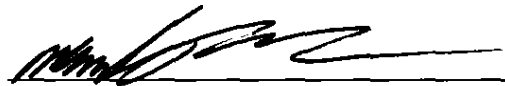
**Count 1:** On or about March 3, 2006 in Lackawanna County, in the Middle District of Pennsylvania, the defendant, **Rafael Figueroa**, did knowingly, intentionally and unlawfully possess with intent to distribute, and did distribute heroin and cocaine base (crack), a Scheduled controlled substance, in violation of Title 21, United States Code, Section 841 (a) (1).

**Count 2:** On or about March 3, 2006 in Lackawanna County, in the Middle District of Pennsylvania, the defendant, **Wilma Garcia**, did knowingly, intentionally and unlawfully possess with intent to distribute, and did distribute heroin, a Scheduled controlled substance, in violation of Title 21, United States Code, Section 841 (a) (1).

I further state that I am a Special Agent of the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof. ☒ Yes ☐ No


  
Signature of Complainant

Sworn to before me, and subscribed in my presence

3/14/06 at \_\_\_\_\_  
Date

Scranton PA  
City and State

THOMAS M. BLEWITT, U.S. Magistrate Judge  
Name and Title of Judicial Officer

  
Signature of Judicial Officer